### BRUCE J. MELTZER, A Professional Corporation

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Attorney for Garnishee Duggan Partners, LLC a/k/a Dugan Partners, LLC



### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY (Newark Vicinage)

CHEROKEE SOLUTIONS, INC.

n/k/a CHEROKEE RESOLUTIONS,

INC., Assignee of Cityscape Corp.

A New Jersey Corporation

Plaintiff,

VS.

WALSH SECURITIES CORP. a/k/a

WALSH SECURITES, INC. a/k/a

WALSH SECURITIES

INCORPORATED a/k/a WALSH

HOLDINGS a/k/a WALSH

HOLDINGS, LLC a/k/a WALSH

HOLDINGS, INC. a/k/a WALSH

PROPERTY, INC. a/k/a WALSH

PROPERTY, LLC f/k/a GF

MORTGAGE CORP. f/k/a GF

HOLDINGS, INC. a/k/a GF

HOLDINGS, LLC a/k/a GF

PROPERTY, INC. a/k/a GF

PROPERTY, LLC n/k/a EQUITY

REWARDS MORTGAGE, INC.

a/k/a WSI, INC. a/k/a FIRESIDE

FINANCIAL, INC. a/k/a REAL

MONEY, INC.

A New York Corporation

Defendant,

and

DUGAN PARTNERS, LLC a/k/a DUGGAN PARTNERS, LLC A New Jersey Corporation

Garnishee.

Misc. Action No. 2:01-mc-00021 (KSH)

CERTIFIED ANSWER OF GARNISHEE DUGGAN PARTNERS, LLC a/k/a DUGAN PARTNERS, LLC TO PLURIES WRIT OF EXECUTION FOR REGISTERED JUDGMENT

Duggan Partners, LLC a/k/a Dugan Partners, LLC (Mistakenly identified as Dugan Partners, LLC a/k/a Duggan Partners, LLC) ("Garnishee"), by and through its attorney, Bruce J. Meltzer, Esquire, does hereby answer the *Pluries* Writ of Execution for Registered Judgment of Cherokee Solutions, Inc. k/n/a Cherokee Resolutions, Inc., Assignee of Cityscape Corp. against Walsh Securities corp. a/k/a Walsh Securities, Inc. a/k/a Walsh Securities Incorporated a/k/a Walsh Holdings a/k/a Walsh Holdings, LLC a/k/a Walsh Holdings, Inc. a/k/a Walsh Property, Inc. a/k/a GF Mortgage Corp. f/k/a GF Holdings, Inc. a/k/a GF Holdings, LLC a/k/a GF Property, LLC n/k/a Equity Rewards Mortgage, Inc. a/k/a WSI, Inc. a/k/a Fireside Financial, Inc. a/k/a Real Money, Inc. (collectively "Walsh"), and in support thereof, avers as follows:

- Plaintiff Cherokee Solutions, Inc. k/n/a Cherokee Resolutions, Inc., Assignee of Cityscape Corp. is, upon information and belief, a New Jersey corporation with a business address of P.O. Box 6357, East Brunswick, NJ 08816.
  - Defendant Walsh is, upon information and belief, a New York Corporation.
- Garnishee Duggan is a New Jersey corporation with a business address of P.O.
  Box 712, Asbury Park, NJ 07712.
- 4. On or about January 3, 2001, judgment was entered in favor of Cityscape Corp. and against Walsh in the total amount of \$4,732,568.93 ("Judgment") in the U.S. District Court for the Southern District of New York, Case No. 98-cv-223.
- 5. On or about May 26, 2004, the Judgment was assigned to Cherokee pursuant to an Assignment of Judgment and subsequently registered in this jurisdiction.

6. In or about July 2005, Cherokee served a *Pluries* Writ of Execution against Garnishee seeking, *inter alia*, mortgages or loans belonging to Walsh in the possession of Garnishee.

7. Garnishee denics that it has any assets or property belonging to Walsh of any kind (including, but not limited to, mortgages, notes, repurchased loans or any other loans or loan documents) in its possession, custody or control.

WHEREFORE, Garnishee Dugan Partners, LLC a/k/a Duggan Partners, LLC hereby demands judgment against Cherokee Solutions, Inc. k/n/a Cherokee Resolutions, Inc., Assignee of Cityscape Corp. vacating and marking as satisfied the *Pluries* Writ of Execution for Registered Judgment served upon Garnishee, and for such other and further relief as this Court deems just and appropriate.

#### **BRUCE J. MELTZER**

A Professional Corporation Attorney for Garnishee Duggan Partners, LLC a/k/a Dugan Partners, LLC

By:

Bruce J. Meltzer

Dated: August 10, 2005

# **CERTIFICATION OF SERVICE**

I, Bruce J. Meltzer, do hereby certify that on the date shown below, I caused to be served a true and correct copy of the Answer of Garnishee Duggan Partners, LLC a/k/a Dugan Partners, LLC on Plaintiff by United States First Class Mail, Postage Prepaid, as follows:

Nancy A. Washington, Esquire Saiber Schlesinger Satz & Goldstein, LLC One Gateway Center 13<sup>th</sup> Floor Newark, NJ 07102

Meltzer

Date: August 10, 2005

# **CERTIFICATION OF FACSIMILE SIGNATURE**

- I, Bruce J. Meltzer, do hereby certify as follows:
- 1. Affiant Edmund "Ned" Brown is unavailable to sign the Certification attached to this pleading.
  - 2. Affiant has acknowledged to me the genuineness of the signature affixed hereto.
- 3. The Certification or a copy with an original signature affixed will be filed if requested by the court or a party.

Bruce J. Meltzer